



Department of Energy

ROCKY FLATS OFFICE
P O BOX 928
GOLDEN, COLORADO 80402-0928



000023181

MAR 22 1993

93-DOE-03173

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

This is in response to your letter of February 17, 1993 requesting a status update on implementation of approved work plans for Operable units 4 through 14.

As you are aware, through our discussions with you over the last several months, many factors have affected DOE's ability to be in schedule compliance with the IAG. Again it bears repeating that many, if not all, assumptions, such as procurement, laboratory capacity, review times, work scope, etc., upon which the original IAG schedules were based were not valid. Procurement lead times were not properly allowed for in the original schedules. Laboratory capacity requirements were underestimated. With respect to the former, DOE has held numerous discussions with you on DOE's procurement requirements that are in compliance with the Federal Acquisition Regulations (FARs) and DOE's implementation of them through the DEARs. We have made substantial progress in acquiring sufficient laboratory capacity to meet our requirements. However, radiochemistry analytical support for soils will continue to be a concern. Nevertheless, based on our present sampling and analytical needs, we have reduced our soils chemistry backlog. We expect to be able to remain current through careful sample management and resource allocation. However, any unexpected downtime in our contract laboratories or expedited sampling program could upset this resource balance. We also have made progress in doing a better job in cost and schedule estimating and in internal and external reviews of work plans and reports. Although DOE feels it has made substantial progress in its commitments to the IAG, fundamental issues still exist.

Our ability to fund IAG-related activities at Rocky Flats is becoming increasingly difficult as DOE has complex-wide environmental issues to address. Costs of environmental restoration projects are substantially higher than what the original IAG

1/2

000023181

A-GU11-000059

MAR 22 1993

M. Hestmark and G. Baughman
93-DOE-03173

2

anticipated. Nevertheless, DOE has provided ever increasing budgets to its environmental restoration programs at Rocky Flats. The program has grown from about \$50M in 1990 to over \$160M for fiscal year 1993.

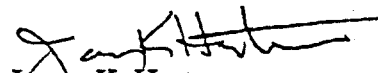
In addition to the above, the announced mission change for Rocky Flats Plant has provided an opportunity to re-evaluate some of the restoration activities under the IAG. Operable Units 8 through 14 (less 11) include various parts of the industrial area. With anticipated transition and future decontamination and decommissioning (D&D) it would be more cost effective to defer some, if not most, of the characterization and assessment activities that these work plans represent. It is quite likely that if these work plans were implemented now, the work would have to be redone after, or as part of, D&D. There are also potentially significant safety and logistical issues related to performing intrusive activities around some of these buildings. Therefore, it is prudent to take a more studied approach to implementing these work plans.

Although there is a technical and logical argument for deferring work in the industrial area, DOE is, as you are aware, evaluating some alternative approaches. The implementation of the "Optimal Interim Remedial Action Plan (O-IRAP)", which has been discussed with you in concept, may be an appropriate alternative until D&D is better defined. In addition, DOE and EG&G have begun looking at the potential of integrating non-intrusive work for these OUs as a first step in implementing the work plans. We look forward to discussing the specifics of this at your convenience.

The enclosed table summarizes the current status of each of the OUs for which you requested a status update. Through our discussions with you on "current conditions" it is apparent that compliance with many of the present IAG milestone schedules from this time forward cannot be achieved as currently defined. DOE is continually evaluating its processes and requirements to determine what efficiencies can be achieved, what resources can be efficiently and cost effectively applied, and what the logistical limitations of doing restoration work really are. We look forward to the opportunity to share this information with you and work these issues together to find the best solution to this situation. I believe our recent agreements in this area will go a long way towards reaching agreement on a revised approach.

Again, we look forward to meeting with you to discuss in detail the questions you raised in your letter.

Sincerely,



James K. Hartman
Assistant Manager for Transition
and Environmental Restoration

Enclosure

2/2